### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DEBRA FRAZIER, et al.  Plaintiffs  V.	: CIVIL ACTION : DOCKET NO.: 17-cv-05421 :
CITY OF PHILADELPHIA, et al.  Defendants.	: JURY TRIAL OF TWELVE (12) JURORS DEMANDED :
<u>ORDER</u>	
AND NOW, this day of	2022, upon consideration of Plaintiff,
Debra Frazier's Motion to Enforce the Settlement Agreement, and any response thereto, it is	
hereby ORDERED and DECREED that Plaintiff, Frazier's Motion is GRANTED, and this	
matter is deemed settled as to Plaintiff, Debra Frazier, consistent with the terms of the	
confidential Settlement Agreement and Release.	
AND IT IS SO ORDERED	
	Hon. Wendy Beetlestone

### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DEBRA FRAZIER, et al. : CIVIL ACTION

DOCKET NO.: 17-cv-05421

Plaintiffs

V.

.

CITY OF PHILADELPHIA, et al. : **JURY TRIAL OF TWELVE (12)** 

JURORS DEMANDED

Defendants. :

# PLAINTIFF, DEBRA FRAZIER'S MOTION TO ENFORCE THE SETTLEMENT <u>AGREEMENT</u>

Plaintiff, Debra Frazier, by and through her undersigned counsel, hereby bring this

Motion to Enforce Settlement Agreement and respectfully requests this Honorable Court to enter

Plaintiff's proposed Order, for the following reasons:

- 1. On December 1, 2017, Plaintiffs initiated this lawsuit against the City of Philadelphia, et al.
- 2. On November 16, 2022, the parties attended a settlement conference with Magistrate Judge Hey, wherein this matter was resolved. Judge Hey worked very hard to settle this matter and when it did resolve, Judge Hey had all parties on the phone to acknowledge the terms of the settlement.
- 3. Plaintiff, Debra Frazier signed a confidential Settlement Agreement and General Release.
- 4. Plaintiff now requests this Honorable Court enter the attached Order deeming this matter settled as to Co-Plaintiff, Debra Frazier, consistent with the terms of the confidential Settlement Agreement and Release.

**WHEREFORE**, Plaintiff, Debra Frazier, by and through her undersigned counsel, respectfully requests this Honorable Court enter Plaintiffs' proposed Order, deeming this matter

settled as to Plaintiff, Debra Frazier, consistent with the terms of the confidential Settlement Agreement and Release.

### WEISBERG LAW

/s/ Matthew B. Weisberg
Matthew B. Weisberg, Esq.
PA Attorney ID No. 85570
David A. Berlin, Esq.
PA Attorney ID No. 314400
7 South Morton Ave
Morton, PA 19070
610-690-0801
Fax: 610-690-0880

Attorney for Plaintiff

### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DEBRA FRAZIER, et al. : CIVIL ACTION

DOCKET NO.: 17-cv-05421

Plaintiffs :

V.

.

CITY OF PHILADELPHIA, et al. : **JURY TRIAL OF TWELVE (12)** 

JURORS DEMANDED

Defendants. :

## PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF, DEBRA FRAZIER'S MOTION TO ENFORCE THE SETTLEMENT AGREEMENT

In light of the simplistic nature of the attached Motion, Plaintiff incorporates same by reference as if fully set forth at length herein for the sake of efficiency.

WHEREFORE, Plaintiff, Debra Frazier, by and through her undersigned counsel, respectfully requests this Honorable Court enter Plaintiffs' proposed Order, deeming this matter settled as to Plaintiff, Debra Frazier, consistent with the terms of the confidential Settlement Agreement and Release.

#### WEISBERG LAW

/s/ Matthew B. Weisberg
Matthew B. Weisberg, Esq.
PA Attorney ID No. 85570
David A. Berlin, Esq.
PA Attorney ID No. 314400
7 South Morton Ave
Morton, PA 19070
610-690-0801
Fax: 610-690-0880

Fax: 610-690-0880 Attorney for Plaintiff

#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DEBRA FRAZIER, et al. : CIVIL ACTION

DOCKET NO.: 17-cv-05421

Plaintiffs :

V.

.

CITY OF PHILADELPHIA, et al. : JURY TRIAL OF TWELVE (12)

**JURORS DEMANDED** 

Defendants. :

#### **CERTIFICATE OF SERVICE**

I, David A Berlin, Esquire, hereby certify that on this 19<sup>th</sup> day of August 2022, a true and correct copy of Plaintiff's Motion to Enforce the Settlement Agreement, was served via ECF upon all counsel of record, including:

Nicole S. Morris, Esq. City of Philadelphia Law Dept. 1515 Arch Street, 16<sup>th</sup> Floor Philadelphia, PA 19102

Joseph J. Santarone, Esq. Marshall Dennehey Warner Coleman & Goggin 2000 Markst Street, Suite 2300 Philadelphia, PA 19103

Lauri A. Kavulich, Esq. Clark Hill PLC Two Commerce Square 2001 Market Street, Suite 2620 Philadelphia, PA 19103

WEISBERG LAW

/s/ Matthew B. Weisberg
Matthew B. Weisberg, Esq.
PA Attorney ID No. 85570

David A. Berlin, Esq.
PA Attorney ID No. 314400
7 South Morton Ave
Morton, PA 19070
610-690-0801
Fax: 610-690-0880

Fax: 610-690-0880 Attorney for Plaintiff